EDMS # 45828359

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
DSM COPOLYMER / ADDIS PLANT
PROPOSED VOC EMISSION REDUCTION CREDITS (ERC)

The LDEQ, Office of Environmental Services, is accepting written comments on a proposed VOC Emission Reduction Credits (ERC) for DSM Copolymer, 8560 Anselmo Lane, Baton Rouge, LA 70810, for the Addis Plant. The facility is located at **9263 Highway 1 South in Addis, West Baton Parish.**

DSM Copolymer, Permit No. 3120-00004-V0, requested to add Emission Reduction Credits (ERC) of VOC) to the LDEQ Emission Reduction Credits Banking System.. This action is due to the permanent shutdown of the Addis Plant, a synthetic rubber manufacturing plant, on January 5, 2005.

The total estimated emission reductions in tons per year (TPY) are as follows:

		VOC
Allowable emissions before reduction:		553.74
Actual emissions (2001/2002 average) (§607.C.2):		464.65
Adjusted allowable emissions (§607.C.3):		550.74
Baseline emissions (§607.C.4):		464.65
Allowable emissions after reduction (§607.C.5):		0.00
Surplus emission reduction (§607.C.6):		464.65
Adjustments for netting (§607.D):		0.00
Total ERC:		**464.65**

The Department is hereby providing notice of its determination that the reductions are surplus, permanent, quantifiable, and enforceable in accordance with LAC 33:III.Chapter 6 as of the date of this notice. A second analysis of the validity of the emission reductions as ERC will be provided when a request to use these reductions as nonattainment new source review (NNSR) offsets is received.

Written comments, written requests for a public hearing, or written requests for notification of the final decision regarding this proposed emission reductions may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Monday, March 22, 2010.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The draft certificate, Emission Reduction Credit (ERC) application and Analysis of Validity of Emission Reductions as ERC are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

form_7115_r01
04/30/07

An additional copy may be reviewed at the West Baton Parish Library-Headquarters, 830 N. Alexander Avenue, Port Allen, LA.

Inquiries or requests for additional information regarding this permit action should be directed to John H. Dyer, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3005.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the draft certificate and the analysis of Emission Reduction Credits (ERC) can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at www.doa.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 2519, Permit Number 3120-00004-V0, and Activity Number PER20060001.

Publication date: February 18, 2010

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

ADDIS PLANT
DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA
AI NO. 2519
ACTIVITY NO. PER20060001

Background

DSM Copolymer operated a synthetic rubber manufacturing plant located one mile south of Addis in West Baton Rouge Parish, Louisiana. The plant consisted of three units (EP-1, EP-2, and OA-1) and produced both solid and liquid polymers. The plant was shut down in January 2005. At the time of closure, the facility was operating under Permit 3120-00004-V0, issued March 5, 2004, and administratively amended July 30, 2004.

To produce solid polymer, ethylene and propylene plus a third monomer were mixed in a desired ratio and then metered into reactor vessels with a solvent. A catalyst was added and polymerization ensued. The polymer/solvent solution was pumped from reactors to the coagulation section where the majority of unreacted monomers and solvent were removed and recycled. A stripping section removed the remaining monomers and solvent. The crumb rubber was then pumped to the finishing section where it was mechanically dewatered and pressed into bales for shipment. Recycled monomers and solvent were pumped to the recovery section for purification and drying before being returned to the feed blending section.

To produce liquid polymer, ethylene and propylene monomer were mixed in a desired ratio and then metered into reactor vessels with a solvent. A catalyst was added and polymerization ensued. A third monomer may hay have been added to produce a different liquid polymer. The polymer/solvent solution was pumped from reactors to the flash finishing section. Here the polymer was mixed with hot oil, and unreacted monomers and solvent were separated from the concentrated oil/polymer product. This product was stored in tanks before being shipped by rail car. Monomers and solvent were sent to a recovery section before being returned to the feed blending section.

The majority of the VOC emission reduction is from shutdown of the finishing sections, the storage tanks, and fugitive losses from pumps, valves, and other fittings. Emissions were controlled in accordance with federal and state regulations, primarily 40 CFR 63, Subpart U - NESHAP: Group I Polymers and Resins.

Summary

A portion of the resultant VOC emission decrease is surplus, permanent, quantifiable, and enforceable in accordance with LAC 33:III.Chapter 6-Regulations on Control of Emissions Through the Use of Emission Reduction Credits Banking. Accordingly, these reductions qualify as Emissions Reduction Credits (ERC). Amounts in the following table are given in tons per year (TPY).

Total ERC:

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

ADDIS PLANT
DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA
AI NO. 2519
ACTIVITY NO. PER20060001

Source (EIQ No.)	Description	Allowable Emissions Before Reduction[1]	Adjusted Allowable Emissions[2]	Actual Emissions[3]	Allowable Emissions after Reduction	Surplus Emission Reduction
4-78	Hexane Recycle	0	0	0	0	
7-78	Natural Gas K.O. Drain	0.48	0.48	0	0	
8-78	Fresh Hexane Tank	6.09	6.09	2.00	0	2.00
16-78	Wet Wash Solvent Surge	2.28	2.28	1.00	0	1.00
18-78	Tramp Stripper Outfall E.P.1	0.11	0.11	0.11	0	0.11
19-78	Dry Wash Solvent Surge	1.75	1.75	1.75	0	1.75
20-78	Low Pressure Vent	0	0	0	0	
21-80	Toluene Storage Tank	0.19	0.19	0	0	
22-80	Gasoline Storage Tank	0.01	0.01	0	0	
23-81	Catalyst Make-up Tank EP 1A	1.62	1.62	1.62	0	1.62
24-81	Catalyst Make-up Tank EP 1B	1.62	1.62	1.62	0	1.62
25-81	Catalyst Make-up Tank OA 1A	1.62	1.62	1.62	0	1.62
26-81	Catalyst Make-up Tank OA 1B	1.62	1.62	1.00	0	1.00
27-81	Antioxidant Make-up Tank A	0.06	0.06	0	0	
28-81	Promoter Make-up Tank A	0.24	0.24	0	0	
29-81	Neat Catalyst Tank	0.31	0.31	0.31	0	0.31
30-81	Alkyl Blend tank	0	0	0.00	0	
31-81	OA1 Dry Recycle Solvent Tank	0	0	0.00	0	
32-81	Flare Stack	0.61	0.61	0.61	0	0.61
33-81	EN Recovery Jet	1.04	1.04	1.00	0	1.00
34-81	Finishing Line N. #9 Dryer	49.47	49.47	49.00	0	49.00
35-81	Finishing Line S. #8 Dryer	49.47	49.47	49.00	0	49.00
38-82	Finishing Line 3rd #7 Dryer	49.47	49.47	49.00	0	49.00
39-82	Stripper Shaker Screen OA1	2.37	2.37	2.00	0	2.00
40-82	Alkyl Storage tank	0.13	0.13	0	0	
41-82	Promoter Make-up Tank B	0.86	0.86	0.86	0	0.86
43-82	NVP Storage Tanks (3)	0.04	0.04	0	0	
44-82	Dicumyl Peroxide Storage	0.04	0.04	0	0	
45-83	Boiler No 1	3.00	0[4]	0.00	0	
46-83	Boiler No 2	3.00	3.00	2.00	0	2.00
48-86	Tramp Stripper Outfall OA 1	0.11	0.11	0.11	0	0.11
49-88	RD Storage Tank	0.04	0.04	0	0	
50-88	Neat Promoter Storage Tank	0.001	0.001	0	0	
51-88	A.O.Feed Tank EP 2	0.10	0.10	0	0	

[1] Permit No. 3120-0004-V0
[2] Calculated in accordance with §607.C.3
[3] Average of 2001 and 2002 actual emissions (§607.C.2)
[4] Boiler No. 1 claimed in earlier Bank Credit Application

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ADDIS PLANT
DSM COPOLYMER
ADDIS, WEST BATON ROUGE PARISH, LOUISIANA
AI NO. 2519
ACTIVITY NO. PER20060001

Source (EIQ No.)	Description	Allowable Emissions Before Reduction[1]	Adjusted Allowable Emissions[2]	Actual Emissions[3]	Allowable Emissions after Reduction	Surplus Emission Reduction
54-88	Promoter make-up Tank EP 2	1.51	1.51	1.00	0	1.00
55-88	Tramp Stripper Outfall EP 2	0.11	0.11	0	0	
57-88	Catalyst Make-up Tank A EP 2	0.77	0.77	0.77	0	0.77
58-88	Catalyst Make-up Tank B EP 2	0.77	0.77	0.77	0	0.77
59-88	Low Pressure Vent EP 2	0	0	0	0	
60-88	Maleic Anhydride Storage Tank	0.04	0.04	0	0	
61-88	Finishing Building Expeller #9	18.12	18.12	10.00	0	10.00
62-88	Finishing Building Expeller #8	18.12	18.12	10.00	0	10.00
63-88	Finishing Building Expeller #7	18.12	18.12	10.00	0	10.00
64-89	Propylene Sphere	0	0	0	0	
68-89	NPPDA Storage Tank	0.04	0.04	0	0	
69-90	Wastewater Transfer Tanks	0.04	0.04	0	0	
70-90	Oil Additives Storage tanks	0.04	0.04	0	0	
71-90	Extender Oil Storage Tanks	0.04	0.04	0	0	
73-90	Finishing Building Expeller #10	35.62	35.62	34.00	0	34.00
74-90	Finishing Line 4th #10 Dryer	49.41	49.41	47.00	0	47.00
76-99	Third Stage Recovery	0	0	0.00	0	0.00
98	Propylene Tower Fugitives	2.41	2.41	2.00	0	2.00
99	Addis Plant Fugitives	230.83	230.83	184.50	0	184.50
TOTALS		553.74	550.74	464.65	0	464.65

SUMMARY:

	Baseline emissions (§607.C.4):	464.65[5]
	Allowable emissions after reduction (§607.C.5):	0.00
	Surplus emission reduction (§607.C.6):	464.65
	Adjustments for netting (§607.D):	-0.00
	Total ERC:	**464.65**

Analysis of validity

Timeliness

Per §615.A, all applications for banking emission reductions shall be submitted by March 31 following the year in which the reductions occurred. The Addis Plant was shut down in January 2005. The application was

[5] Baseline emissions shall be the lower of actual emissions or adjusted allowable emissions when the design value for the nonattainment area is not above the NAAQS for ozone (§607.C.4.a.ii).

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

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AI NO. 2519
ACTIVITY NO. PER20060001

dated March 30, 2006 [6]

Emissions reductions can be recognized as ERC only if they are determined to be surplus, permanent, quantifiable, and enforceable. Each criterion is addressed below.

Surplus

Procedures for calculating the surplus emission reduction are outlined in §607.C & D.

1. The design value for the nonattainment area is below the 1-hour national ambient air quality standard (NAAQS) for ozone. Per §607.C.4.ii, if the design value for the nonattainment area is not above the 1-hour national ambient air quality standard (NAAQS) for ozone, the department shall compare the actual emissions with the adjusted allowable emissions in order to determine baseline emissions.

2. Calculate actual emissions during the baseline period. Actual emissions during the baseline period of 2001 and 2002 claimed in the Addis Plant ERC Bank application were checked against the department's Emission Inventory database. Adjustments were made as required to determine total actual emissions for the 53 emission points listed in the application as undergoing reduction. See the table in the "Summary" section. VOC emissions during the baseline period were calculated to be 464.65 TPY.

3. Calculate adjusted allowable emissions. Allowable emissions shall be adjusted to account for all new or revised federal or state regulations adopted that will require, or would have required, all or a portion of the emission reductions that comprise the ERC application. At the time of closure, the DSM Copolymer synthetic rubber manufacturing plant was operating under Title V Permit No. 3120-00004-V0 issued March 5, 2004. During the baseline period of 2001-2002 the plant was subject to Permit 3120-00004-03 issued July 10, 1997. Both permits required compliance with the emission control regulations of 40 CFR 63, Subpart U, NESHAP: Group I Polymers and Resins, which had the greatest impact on reducing VOCs emitted by the plant. State regulation §2103 affected some storage tanks and also had an impact in reducing VOCs, but to a lesser extent than Subpart U. The department examined amendments to both the applicable federal and state regulations to determine if any of the emission points in the ERC application would have had to undergo further reduction and no new or modified control requirements were found. Therefore, the emission limits contained in the Title V permit in force at the time of plant closure also represented the "adjusted allowable emissions" as defined by §607.C.3. See the table in the "Summary" section. Adjusted allowable emissions total 550.741 TPY.

4. Quantify baseline emissions. Per §607.C.4.a.ii, if the design value is not above the NAAQS for ozone, baseline emissions shall be the lower of actual emissions (step 2 above) or adjusted allowable emissions determined in accordance with §607.C.3 (step 3 above). In this case, actual emissions are the limiting factors. Baseline emissions total 464.65 TPY.

5. Calculate allowable emissions after the reductions occurred. The plant was permanently shut down, thus, allowable emissions are zero.

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[6] See EDMS Document No. 34135205 (pg. 2 of 120)

ANALYSIS OF VALIDITY OF EMISSION REDUCTIONS AS ERC

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LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

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AI NO. 2519
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6. Calculate the surplus emission reduction by subtracting the allowable emissions after the reduction occurred from the baseline emissions.

   464.65 TPY - 0.00 TPY = 464.65 TPY

7. Finally, adjust for netting (§607.D). Emission reductions used in a netting analysis (i.e., to determine the *net emissions increase* as defined in LAC 33:III.504 or 509, as appropriate) that prevented the increase from being considered "significant" are not eligible for use as offsets. The quantity of emission reductions utilized to "net out" shall not be considered creditable. There is zero adjustment for netting, as the emission reductions were not used in a netting analysis.

   464.65 TPY - 0.00 TPY = 464.65 TPY

Permanent

The reductions are permanent because the plant was shut down in January 2005, the facility was demolished shortly thereafter, and the air emissions permit was terminated on October 10, 2006.

Quantifiable

The emissions from the plant were calculated using approved EPA methods, EPA emission factors, process data, and production data.

Enforceable

Finally, the reductions are enforceable because the emission sources were permanently removed from the site and Permit No. 3120-00004-V0 was terminated by the department.

BOBBY JINDAL
GOVERNOR

PEGGY M. HATCH
SECRETARY

State of Louisiana

DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest (AI) No.: 2519
Activity No.: PER20060001

Lloyd J. Tabary II
Corporate Representative
DSM Copolymer
8560 Anselmo Lane
Baton Rouge, LA 70810

RE: VOC Emission Reduction Credits, Addis Plant, DSM Copolymer, Addis, West Baton Rouge Parish, Louisiana

Dear Mr. Tabary:

Please find enclosed your Emission Reduction Credit (ERC) Certificate to reflect the creditable VOC reductions realized by permanently shutting down the Addis Plant.

A notice requesting public comment on the ERC Certificates was published in both *The Advocate* and the *XXXXXX* on February xx, 2010. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on February xx, 2010. XX comments were received.

If you have any questions, please call John H. Dyer of the Air Permits Division at (225) 219-3005.

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary

_____
Date

CSN:JHD

Louisiana Department of Environmental Quality
Emission Reduction Credit Certificate

Item Number: 2519PER20060001

Owner: DSM Copolymer

Phone number: (225) 490-0021

Company Address: 8560 Anselmo Lane
Baton Rouge, Louisiana 70810

EMISSION REDUCTION INFORMATION

Physical Location: 9263 Highway 1 S, Addis 70710, West Baton Rouge Parish

Method of ERC creation: Permanent Shutdown of the Addis Plant (Activity Number PER20060001)

Pollutant: VOC (tons)

Amount Generated 464.65

Date of emission reduction: January 5, 2005

_____
Assistant Secretary

_____
Date

EMISSION REDUCTION CREDIT BANK APPLICATION

DSM COPOLYMER INC.
ADDIS PLANT
ADDIS, LOUISIANA 70710

DSM

MARCH 2006

MAIN FILE

original to TOA

copy to Admin / B. Johnston

AI 2519

DSM Copolymer
DSM Elastomers Americas

5745 Essen Lane, Suite 100-A
Baton Rouge, LA 70810

Lloyd J. Tabary II
Counsel and Secretary
Phone: (225)-490-0021
Facsimile: (225)-490-0029

DSM

March 30, 2006

Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Air Permits Division
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312

RE: DSM Copolymer, Inc. – Addis Facility
Emission Reduction Credit Bank Application

To Whom It May Concern:

Enclosed are three copies of our company's Emission Reduction Credit Bank Application for your review. If you have any questions regarding this report, please contact me at (225) 490-0021.

Sincerely,

Lloyd J. Tabary II
Corporate Secretary

RECEIVED
APR 0 3 2006
DEPT. OF ENVIRONMENTAL QUALITY
OFFICE OF ENVIRONMENTAL SERVICES
PERMIT DIVISION

EMISSION REDUCTION CREDIT BANK APPLICATION

DSM COPOLYMER INC.
ADDIS PLANT
ADDIS, LOUISIANA 70710

DSM

MARCH 2006

DSM

ERC BANK APPLICATION

Department of Environmental Quality
Office of Environmental Services
Air Permits Division
P.O. Box 4313
Baton Rouge, LA 70821-4313
(225) 219-3181

LOUISIANA

ERC BANK APPLICATION

NO_X ☐ OR VOC ☒

COMPANY: DSM Copolymer — 2519 (Agency Interest No.)

FACILITY: Addis Facility — 3120-00004-V0 (Permit No.)

LOCATION: Addis (City) — West Baton Rouge (Parish)

9263 Louisiana Highway 1 South (Physical Location)

CONTACT: Lloyd Tabary (Name) — Attorney At Law (Title) — 225-490-0021 (Phone)

MAILING ADDRESS: 9263 La. Hwy 1 S (Street or P.O. Box) — Addis (City) — LA (State) — 70710 (Zip Code)

(Affected EIQ Source ID(s))	(Date of Actual Emissions Decrease)	(Baseline Period)
4-78, 7-78, 8-78, 16-78, 18-78, 19-78, 20-78, 21-80, 22-80, 23-81, 24-81, 25-81, 26-81, 27-81, 28-81, 29-81, 30-81, 31-81, 32-81, 33-81, 34-81, 35-81, 38-82, 39-82, 40-82, 41-82, 43-82, 44-82, 45-83, 46-83, 48-86, 49-88, 50-88, 51-88, 54-88, 55-88, 57-88, 58-88, 59-88, 60-88, 61-88, 62-88, 63-88, 64-88, 68-89, 69-90, 70-90, 71-90, 73-90, 74-90, 76-99, 98, 99	January 2005	Jan. 2001 - Dec. 2002

	NO_X (Chapter 22 only)		NO_X	VOC
ALLOWABLES BEFORE:	N/A (May 1 - September 30)	N/A (October 1 - April 30)	N/A (TPY)	556.74 (TPY)
AVG. ACTUAL EMISSIONS:	N/A (May 1 - September 30)	N/A (October 1 - April 30)	N/A (TPY)	454.00 (TPY)
CHAPTER 22 LIMIT:	N/A (May 1 - September 30)	**N/A** (October 1 - April 30)	**N/A** (TPY)	**N/A** (TPY)
ALLOWABLES AFTER[1]:	N/A (May 1 - September 30)	N/A (October 1 - April 30)	N/A (TPY)	0.00 (TPY)
CREDITABLE CHANGE:	N/A (May 1 - September 30)	N/A (October 1 - April 30)	N/A (TPY)	454.00 (TPY)

[1]Allowables should account for all applicable federal and state regulations, emissions limitations, compliance orders, consent decrees, etc. In the case of enforcement instruments, surplus reductions may be included as per he terms of the order or agreement. If no such terms are included, then the reductions are not surplus.

CREDIBILITY:
All applicable state and federal regulations that apply to the affected emission point(s) should be addressed in the cover letter to this document.

RESPONSIBLE OFFICIAL CERTIFICATION:
I hereby certify that the information contained in this ERC Bank Application and attached calculations is true and accurate to the best of my knowledge.

Lloyd Tabary (Name) | Corporate Secretary (Title) | 225-490-0021 (Phone)

(Signature) | March 31 2006 (Date)

DSM

ERC ANALYSIS
(CALCULATIONS)

Adj. Allowable VOC Emissions

NEDS ID	EIQ#	Description	Allowable Emissions before Reduction (tpy) [1]	Adjusted Allowable Emissions (tpy) (§607.C.3) [2]
04	4-78	HEXANE RECYCLE - NO EMISSION C2 BLANKET	0	0
07	7-78	HEXANE RECYCLE - NO EMISSION C2 BLANKET	0.48	0.48
08	8-78	HEXANE MANWAY	6.09	6.09
16	16-78	WET WASH SOLVENT SURGE	2.28	2.28
18	18-78	TRAMP STRIPPER OUTFALL EP#1 UNIT	0.11	0.11
19	19-78	HEXANE SURGE TANK	1.75	1.75
20	20-78	LOW PRESSURE VENT	0	0
21	21-80	TOLUENE STORAGE TANK	0.19	0.19
22	22-80	GASOLINE STORAGE TANK	0.01	0.01
23	23-81	CATALYST MAKE-UP TANK EP1 TANK A	1.62	1.62
24	24-81	CATALYST MAKE-UP TANK EP1 TANK B	1.62	1.62
25	25-81	TLA CATALYST MAKEUP TANK A	1.62	1.62
26	26-81	TLA CATALYST MAKEUP TANK B	1.62	1.62
27	27-81	ANTI-OXIDANT MAKE UP TANK	0.06	0.06
28	28-81	PROMOTER MAKEUP TANK	0.24	0.24
29	29-81	NEAT CATALYST STORAGE TANK	0.31	0.31
30	30-81	ALKYL BLEND TANK EP1	2.00	2.00
31	31-81	HEXANE TANK OA1 PLANT	1.00	1.00
32	32-81	PLANT FLARE STACK	0.61	0.61
33	33-81	EN RECOVERY JET	1.04	1.04
34	34-81	FINISHING BUILDING DRYER LINE NO. 9 UNIT	49.47	49.47
35	35-81	FINISHING BUILDING NO. 8 LINE DRYER UNIT	49.47	49.47
38	38-82	FINISHING BUILDING DRYER NO. 7 DRYER UNIT	49.47	49.47
39	39-82	STRIPPER SHAKER SCREENS #3LINE	2.37	2.37
40	40-82	ALUMINUM ALKYL STORAGE TANK	0.13	0.13
41	41-82	PROMOTER MAKEUP TANK	0.86	0.86
43	43-82	NVP STORAGE TANK	0.04	0.04
44	44-82	PEROXIDE STORAGE AREA	0.04	0.04
45	45-83	BOILER No. 1	3.00	3.00
46	46-83	BOILER No. 2	3.00	3.00
48	48-86	TRAMP STRIPPER OUTFALL OA1	0.11	0.11

49	49-88	RD STORAGE TANK	0.04	0.04
50	50-88	PROMOTER STORAGE TANK	0.001	0.001
51	51-88	ANTIOXIDANT FEED TANK EPDM PLANT 2	0.1	0.1
54	54-88	PROMOTER MAKE UP TANK EP 2	1.51	1.51
55	55-88	TRAMP STRIPPER EP 2	0.11	0.11
57	57-88	CATALYST MAKEUP TANK A EP2	0.77	0.77
58	58-88	CATALYST MAKEUP TANK B EP2	0.77	0.77
59	59-88	LOW PRESSURE VENT TANK EP2	0	0
60	60-88	MALEIC ANHYDRIDE STORAGE TANK	0.04	0.04
61	61-88	EXPELLER - NO. 9 FINISHING LINE	18.12	18.12
62	62-88	EXPELLER NO.8 FINISHING LINE	18.12	18.12
63	63-88	EXPELLER - NO. 7 FINISHING LINE	18.12	18.12
64	64-89	C3 SPHERE NO EMISSION TO ATMOSPHERE	0	0
68	68-89	NPPDA STORAGE TANK	0.04	0.04
69	69-90	WATER TRANSFER STORAGE TANKS	0.04	0.04
70	70-90	OIL STORAGE TANK	0.04	0.04
71	71-90	OIL STORAGE TANKS - 3 TANKS	0.04	0.04
73	73-90	EXPELLER - NO. 10 LINE	35.62	35.62
74	74-90	LINE #10 DRYER VENT	49.41	49.41
76	76-99	THIRD STAGE RECOVERY SYSTEM CONDENSER	0	0
98	98	FUGITIVE EMISSIONS PROPENE PURIFICATION	2.41	2.41
99	99	FUG. EMISSIONS PLANT WIDE INCL.EQPT & AREAS	230.83	230.83
		TOTAL	**556.74**	**556.74**

Notes:

1. The Allowable Emissions before Reduction are equal to the permitted PTE emissions in the Part 70 Permit No. 3120-00004-V0.
2. The adjusted allowable emissions took into consideration the allowable emissions from Permit No. 3120-00004-V0. and all new or revised federal and/or state regulations adopted that could require or could have required, all or a portion of the emission reductions that comprise the ERC application.

2001 Actual VOC Emissions

NEDS ID	EIQ#	Description	VOC (tpy)
04	4-78	HEXANE RECYCLE - NO EMISSION C2 BLANKET	0.00
07	7-78	HEXANE RECYCLE - NO EMISSION C2 BLANKET	0.00
08	8-78	HEXANE MANWAY	2.00
16	16-78	WET WASH SOLVENT SURGE	1.00
18	18-78	TRAMP STRIPPER OUTFALL EP#1 UNIT	1.00
19	19-78	HEXANE SURGE TANK	2.00
20	20-78	LOW PRESSURE VENT	0.00
21	21-80	TOLUENE STORAGE TANK	0.00
22	22-80	GASOLINE STORAGE TANK	0.00
23	23-81	CATALYST MAKE-UP TANK EP1 TANK A	2.00
24	24-81	CATALYST MAKE-UP TANK EP1 TANK B	2.00
25	25-81	TLA CATALYST MAKEUP TANK A	2.00
26	26-81	TLA CATALYST MAKEUP TANK B	1.00
27	27-81	ANTI-OXIDANT MAKE UP TANK	0.00
28	28-81	PROMOTER MAKEUP TANK	0.00
29	29-81	NEAT CATALYST STORAGE TANK	2.00
30	30-81	ALKYL BLEND TANK EP1	2.00
31	31-81	HEXANE TANK OA1 PLANT	1.00
32	32-81	PLANT FLARE STACK	2.00
33	33-81	EN RECOVERY JET	1.00
34	34-81	FINISHING BUILDING DRYER LINE NO. 9 UNIT	1.00
35	35-81	FINISHING BUILDING NO. 8 LINE DRYER UNIT	49.00
38	38-82	FINISHING BUILDING DRYER NO. 7 DRYER UNIT	49.00
39	39-82	STRIPPER SHAKER SCREENS #3LINE	2.00
40	40-82	ALUMINUM ALKYL STORAGE TANK	0.00
41	41-82	PROMOTER MAKEUP TANK	1.00
43	43-82	NVP Storage Tank	0.00
44	44-82	PEROXIDE STORAGE AREA	0.00
45	45-83	Boiler No. 1	2.00
46	46-83	Boiler No. 2	2.00
48	48-86	TRAMP STRIPPER OUTFALL OA1	1.00
49	49-88	RD STORAGE TANK	0.00
50	50-88	PROMOTER STORAGE TANK	0.00
51	51-88	ANTIOXIDANT FEED TANK EPDM PLANT 2	0.00
54	54-88	PROMOTER MAKE UP TANK EP 2	1.00
55	55-88	TRAMP STRIPPER EP 2	0.00
57	57-88	CATALYST MAKEUP TANK A EP2	1.00
58	58-88	CATALYST MAKEUP TANK B EP2	1.00
59	59-88	LOW PRESSURE VENT TANK EP2	0.00
60	60-88	MALEIC ANHYDRIDE STORAGE TANK	0.00
61	61-88	EXPELLER - NO. 9 FINISHING LINE	10.00
62	62-88	EXPELLER NO.8 FINISHING LINE	10.00
63	63-88	EXPELLER - NO. 7 FINISHING LINE	10.00
64	64-89	C3 SPHERE NO EMISSION TO ATMOSPHERE	0.00
68	68-89	NPPDA STORAGE TANK	0.00
69	69-90	WATER TRANSFER STORAGE TANKS	0.00
70	70-90	OIL STORAGE TANK	0.00
71	71-90	OIL STORAGE TANKS - 3 TANKS	0.00
73	73-90	EXPELLER - NO. 10 LINE	34.00

2001 Actual VOC Emissions

74	74-90	LINE #10 DRYER VENT	47.00
76	76-99	THIRD STAGE RECOVERY SYSTEM CONDENSER	2.00
98	98	FUGITIVE EMISSIONS PROPENE PURIFICATION	2.00
99	99	FUG. EMISSIONS PLANT WIDE INCL.EQPT & AREAS	178.00
		TOTAL	**424.00**

2002 Actual VOC Emissions

NEDS ID	EIQ#	Description	VOC (tpy)
04	4-78	HEXANE RECYCLE - NO EMISSION C2 BLANKET	0.00
07	7-78	HEXANE RECYCLE - NO EMISSION C2 BLANKET	0.00
08	8-78	HEXANE MANWAY	2.00
16	16-78	WET WASH SOLVENT SURGE	1.00
18	18-78	TRAMP STRIPPER OUTFALL EP#1 UNIT	1.00
19	19-78	HEXANE SURGE TANK	2.00
20	20-78	LOW PRESSURE VENT	0.00
21	21-80	TOLUENE STORAGE TANK	0.00
22	22-80	GASOLINE STORAGE TANK	0.00
23	23-81	CATALYST MAKE-UP TANK EP1 TANK A	2.00
24	24-81	CATALYST MAKE-UP TANK EP1 TANK B	2.00
25	25-81	TLA CATALYST MAKEUP TANK A	2.00
26	26-81	TLA CATALYST MAKEUP TANK B	1.00
27	27-81	ANTI-OXIDANT MAKE UP TANK	0.00
28	28-81	PROMOTER MAKEUP TANK	0.00
29	29-81	NEAT CATALYST STORAGE TANK	2.00
30	30-81	ALKYL BLEND TANK EP1	2.00
31	31-81	HEXANE TANK OA1 PLANT	1.00
32	32-81	PLANT FLARE STACK	2.00
33	33-81	EN RECOVERY JET	1.00
34	34-81	FINISHING BUILDING DRYER LINE NO. 9 UNIT	49.00
35	35-81	FINISHING BUILDING NO. 8 LINE DRYER UNIT	49.00
38	38-82	FINISHING BUILDING DRYER NO. 7 DRYER UNIT	49.00
39	39-82	STRIPPER SHAKER SCREENS #3LINE	2.00
40	40-82	ALUMINUM ALKYL STORAGE TANK	0.00
41	41-82	PROMOTER MAKEUP TANK	1.00
43	43-82	NVP Storage Tank	0.00
44	44-82	PEROXIDE STORAGE AREA	0.00
45	45-83	Boiler No. 1	2.00
46	46-83	Boiler No. 2	2.00
48	48-86	TRAMP STRIPPER OUTFALL OA1	1.00
49	49-88	RD STORAGE TANK	0.00
50	50-88	PROMOTER STORAGE TANK	0.00
51	51-88	ANTIOXIDANT FEED TANK EPDM PLANT 2	0.00
54	54-88	PROMOTER MAKE UP TANK EP 2	1.00
55	55-88	TRAMP STRIPPER EP 2	0.00
57	57-88	CATALYST MAKEUP TANK A EP2	1.00
58	58-88	CATALYST MAKEUP TANK B EP2	1.00
59	59-88	LOW PRESSURE VENT TANK EP2	0.00
60	60-88	MALEIC ANHYDRIDE STORAGE TANK	0.00
61	61-88	EXPELLER - NO. 9 FINISHING LINE	10.00
62	62-88	EXPELLER NO.8 FINISHING LINE	10.00
63	63-88	EXPELLER - NO. 7 FINISHING LINE	10.00
64	64-89	C3 SPHERE NO EMISSION TO ATMOSPHERE	0.00
67	67-89	TEMP. SOLVENT STORAGE TANK	0.00
68	68-89	NPPDA STORAGE TANK	0.00
69	69-90	WATER TRANSFER STORAGE TANKS	0.00
70	70-90	OIL STORAGE TANK	0.00
71	71-90	OIL STORAGE TANKS - 3 TANKS	0.00

2002 Actual VOC Emissions

73	73-90	EXPELLER - NO. 10 LINE	34.00
74	74-90	LINE #10 DRYER VENT	47.00
76	76-99	THIRD STAGE RECOVERY SYSTEM CONDENSER	1.00
98	98	FUGITIVE EMISSIONS PROPENE PURIFICATION	2.00
99	99	FUG. EMISSIONS PLANT WIDE INCL.EQPT & AREAS	191.00
		TOTAL	**484.00**

Baseline VOC Emissions

2001/2002 Average Actual Emissions (tpy) [1]	Adjusted Allowable Emissions (tpy) (§607.C.3) [2]	Baseline Emissions for ERCs (tpy) (§607.C.4) [3]	Allowable Emissions after Reduction (§607.C.5)
454.00	556.74	454.00	0

Notes:

1. The baseline period of 2001 and 2002 was determined to be the period of time over which the historical emissions of the sources were averaged. The two-year period is more representative of normal major stationary source operation as defined per LAC 33:III.605.
2. The adjusted allowable emissions took into consideration the allowable emissions from Permit No. 3120 and all new or revised federal and/or state regulations adopted that could require or could have required, all or a portion of the emission reductions that comprise the ERC application.
3. Baseline Emissions for ERC (tpy) = Lower of 2001/2002 Average Actual Emissions (tpy) and Adjusted Allowable Emissions (tpy)

VOC ERCs

Surplus Emission Reduction (tpy) (§607.C.6) [1]	VOC ERCs Relied upon in NNSR Analysis (tpy) (§607.D)	VOC Requested ERCs for Bank (tpy) [2]
454.00	0.00	454.00

Notes:

1. Surplus Emission Reduction (tpy) = Baseline Emissions (tpy) - Allowable Emissions after Reduction (tpy)
2. VOC Requested ERCs for Bank (tpy) = VOC ERCs from Shutdown (tpy) - ERCs Relied upon in Nonattainment New Source Review (NNSR) Analysis (tpy)

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2001 EIS EMISSIONS BY POINT

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